



February 8, 2019

California Air Resources Board  
1001 I St.  
Sacramento, CA 95814

California Natural Resources Agency  
1416 Ninth St., Suite 1311  
Sacramento, CA 95814

Submitted electronically via

[https://www.arb.ca.gov/lispub/comm2/bcsubform.php?listname=nwldraftplan-  
ws&comm\\_period=1](https://www.arb.ca.gov/lispub/comm2/bcsubform.php?listname=nwldraftplan-<br/>ws&comm_period=1)

**Re: Comment on January 2019 DRAFT California 2030 Natural and Working Lands Climate  
Change Implementation Plan**

Esteemed Responsible Officials:

This brief letter is provided as public comment on the January 2019 DRAFT California 2030 Natural and Working Lands Climate Change Implementation Plan (Draft Plan) on behalf of Biofuelwatch, a nonprofit organization with extensive international and domestic expertise regarding the social and environmental impacts of bioenergy projects. These brief comments are by no means exhaustive, but they are submitted with the intent of highlighting concerns that the Draft Plan fails to integrate the best available science while perpetuating a number of erroneous assumptions regarding land carbon science and the ways in which human activity is disturbing global carbon cycles. By failing to include the best available science the Draft Plan is at risk of providing an implementation road map that will ensure that California fails to achieve the laudable goal of reversing the ongoing and dramatic loss of carbon density on the state's landscapes due to intensely extractive industrial economic activity.

**Reliance on 2018 Forest Carbon Plan Undermines Scientific Basis of Draft Plan**

On numerous occasions the Draft Plan makes reference to the Forest Carbon Plan. The description within the Draft Plan of the Forest Carbon Plan as a "consensus" plan regarding forest practices with robust "stakeholder" participation is not reflective of the deep concern regarding the lack of a sound scientific basis for the plan that has been communicated on repeated occasions to state agency staff responsible for the development of the Forest Carbon



Plan. By relying on a scientifically deficient Forest Carbon Plan, the Draft Plan is thus contaminated by the same lack of integrity that plagues the Forest Carbon Plan. It is our position that many of the actions that are included in the Draft Plan such as intensive mechanical thinning and the prioritization of “biomass utilization” will cause substantial damage to forest ecosystems and habitats throughout California, as well as failing to reverse the dramatic and ongoing loss of carbon density in California’s natural landscapes.

### **The Assertions Regarding Forests Are Unsupported By The Best Available Science**

Amongst the Draft Plan’s core proposed implementation actions are the intensive mechanical treatment of forests on both public and private lands in the state. Also inherent in the plan is an extensive expansion of biomass burning, the construction of new bioenergy facilities, and the expansion of other harvested wood products and biofuel uses of extracted forest resource. Scientific studies and the states own modeling indicate that thinning does not increase carbon storage. At the same time the state still refuses to provide accurate and publicly accessible greenhouse gas emissions data from silviculture applications (i.e. logging in the state). What is also missing from the development of the Draft Plan is a thorough analysis of disturbance regimes, and most especially the critical evolutionary role that fire has in California’s forests, as well as the traditional ecological knowledge regarding fire as a management tool that is available through closer collaboration with indigenous communities in the state.

### **Draft Plan Inclusion of Biomass Burning for Energy Will Increase Emissions**

It is of great concern that the State of California, considered in many circles as a ‘global climate leader,’ continues to perpetuate the erroneous characterization of biomass energy as a renewable resource. Scientific research indicates that biomass burning when combined with mechanical thinning will increase, not decrease, carbon emissions. Though the Draft Plan makes vague assertions about supposed climate benefits of aggressive extraction of forest biomass as feedstock for biomass combustion, the body of scientific evidence demonstrates that biomass energy is extremely carbon-intensive, and is not carbon neutral. This information has been made available to state agency staff on repeated occasions, but staff have refused to integrate any information into the Draft Plan to respond to concerns from the public and civil society about the erroneous assumptions and flawed science regarding biomass energy that permeates the 2018 Forest Carbon Plan and by reference therefore the Draft Plan as well.

### **Conclusion**

For many years now many stakeholders committed to the protection of California’s forests and in support of a true commitment to renewable energy have engaged with state agencies to communicate concern about biomass energy. The increasing drive to consider the state’s forests as mere “feedstock” for bioenergy and wood products is reflective of an extractive approach to land stewardship in the state that will fully undermine the stated objectives of increasing carbon density and climate resilience in California’s ecosystems, and especially our globally important forests. Though this comment letter is not exhaustive it does highlight



matters of global concern regarding the failure of responsible officials in the state to integrate the best available science into climate policy and planning. We hope that this course correction can be made at the earliest available opportunity. Our organization remains available to work with agency staff on these critical matters.

Sincerely,

Rachel Smolker, Ph.D.  
Biofuelwatch, Codirector  
680 Sherman Hollow Rd  
Hinesburg, VT. 05461  
email: [rsmolker@riseup.net](mailto:rsmolker@riseup.net)  
phone: office (802.482.2848), mobile (802.735.7794)

Gary Graham Hughes, M.Sc.  
Biofuelwatch, California Policy Monitor  
PO Box 401  
Redway, CA 95560  
Email: [garyhughes.bfw@gmail.com](mailto:garyhughes.bfw@gmail.com)  
Mobile phone: 707-223-5434